## MILMAN LABUDA LAW GROUP PLLC

3000 MARCUS AVENUE SUITE 3W8 LAKE SUCCESS, NY 11042

TELEPHONE (516) 328-8899 FACSIMILE (516) 328-0082

November 12, 2020

## **VIA ECF**

United States District Court Eastern District of New York Attn: Hon. Sanket J. Bulsara, U.S.M.J. 225 Cadman Plaza East Courtroom 324N Brooklyn, NY 11201-1804

Re: Macas v. Alex's Auto Body 1 Inc., et ano.

Case No.: 1:18-cv-7184 (RJD) (SJB)

MLLG File No.: 120-2019\_

Dear Judge Bulsara:

This office represents the Defendants in the above-referenced case. <u>See</u> Docket Entry 17. Defendants write jointly with to respectfully request a three (3) week extension of time to submit the parties' joint motion for settlement approval.

Pursuant to  $\P$  II(A) of this Court's Individual Practices, the parties submit that: (i) the original date to submit the joint motion is Monday, November 16, 2020, and the proposed new date is Monday, December 7, 2020; (ii) the reason for the requested extension is because the parties need additional time to finalize the settlement agreement and due to the upcoming holidays; (iii) the application is submitted jointly and thus is on consent.

Accordingly, the parties respectfully submit that there is good cause for the requested extension of time. The parties thank this Court for its time, attention, and anticipated courtesies in this case.

Dated: Lake Success, New York November 12, 2020

Respectfully submitted,

## MILMAN LABUDA LAW GROUP PLLC

\_/s Emanuel Kataev, Esq.

Emanuel Kataev, Esq. 3000 Marcus Avenue, Suite 3W8 Lake Success, NY 11042-1073 (516) 328-8899 (office) (516) 303-1395 (direct dial) (516) 328-0082 (facsimile) emanuel@mllaborlaw.com

Attorneys for Defendants

VIA ECF Valli Kane & Vagnini LLP Attn: Robert R. Barravecchio & Alexander M. White, Esqs. 600 Old Country Road, Suite 519 Garden City, NY 11530-2001 rrb@vkvlawyers.com awhite@vkvlawyers.com

Attorneys for Plaintiff